

### **Remark**

Applicants respectfully request reconsideration of this application as amended. Claims 1, 5, 7, 14, 20 and 25 have been amended. Claims 4, 12, 18, 23 and 29 have been canceled. Therefore, claims 1-3, 5-11, 13-17, 19-22, 24-28 and 30 are now presented for examination.

### **35 U.S.C. §103 Rejection**

#### *Chang and Agnihotri*

The Examiner has rejected claims 1-3, 5-11, 13-17, 19-22, 24-28 and 30 under 35 U.S.C. §103(a) as being unpatentable over Chang in view of Agnihotri, WO No. 03/030018 ("Agnihotri").

Claim 1 is amended based on the text at page 10, line 20. This amendment is not believed to affect the scope of the claim but only to remove any perceived ambiguity by restating the previous clause in slightly different form. Accordingly, no new issues are raised. The other independent claims are amended in the same way.

In the response to Arguments, the Examiner focused on Agnihotri. The Examiner states that the text "is implicitly generated as the translated text data is correlated to the related video and sent... directly for display at display 40." However, Figure 1 of the reference shows two different lines 46 and 18.

Claim 1, for example, specifically recites, "... generate character images of the translated text data and superimpose the character images over images of a video portion of the video signal..." A quick look at Agnihotri reveals at page 6, line 27, "the translated text data 46" is sent "along with the video component 18."

Agnihotri has text data and a separate video component. If images of the characters were superimposed over video images, then these images would not be separate synchronized text data. The images would be part of the video.

Agnihotri makes this even more clear by stating "synchronize the translated text data 46 with the pertinent audio and video." 18. If images of the characters were superimposed over video images, then there would be no requirement for synchronization, the video images would contain the text independent of any other signal with which it could be synchronized.

In the substantive rejection of Claim 1, the Examiner refers to Agnihotri as follows (see [abstract], [pg. 3, ll. 19-29], [pg. 6, ll. 27-30], [pg. 8, ll 4-9]).

The abstract states that the translated text data is a signal that is synchronized with the audio and video, referring to it as a "component of the synchronized signal." There is no suggestion that the translated text is in the images of the video signal. Page 3, lines 19-29 and page 6, lines 27-29 similarly describe synchronizing the translated text to the separate audio and video components. Page 8 is cited for the hardware description, inapposite here.

As to Chang, the Examiner states that it is silent on superimposing the translated text data in the form of character images over images of a video portion of the video signal for display.

This difference from Agnihotri is significant. With Agnihotri, the separate translated text component must be decoded by the display and displayed synchronized with the audio and video components. As stated in the background section of the present specification, standards for decoding have limitations in the number and types of characters that can be used. There are additional advantages described in the present

specification starting at page 11, lines 4 et seq., relating to the variety of positioning and representation as well as avoiding the need for synchronization.

Agnihotri is quite clear that the translated text is a separate signal that is synchronized with the audio and video components. Accordingly, the features of the video processor as claimed, for example, in Claim 1 of the present application are not present in any of the cited references and the rejection for obviousness is, respectfully, traversed.

### **Conclusion**

Applicants respectfully submit that the rejections have been overcome by the amendment and remark, and that the claims as amended are now in condition for allowance. Accordingly, Applicants respectfully request the rejections be withdrawn and the claims as amended be allowed.

### **Invitation for a Telephone Interview**

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

### **Request for an Extension of Time**

Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

### **Charge our Deposit Account**

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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